

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

KARLA MOLINA-PARRALES,)
Plaintiff,)
v.)
SHARED HOSPITAL SERVICES)
CORPORATION,)
Defendant.)
Civ. Action No. _____

DEFENDANT'S NOTICE OF REMOVAL

Defendant, pursuant to the provisions of 28 U.S.C. §§ 1331, 1441 and 1446, respectfully submits this Notice of Removal for the purpose of removing the above-captioned action from the Circuit Court for Davidson County, Tennessee to the United States District Court for the Middle District of Tennessee. As grounds for this Notice of Removal, Defendant states as follows:

1. Defendant appears, by and through counsel, for the limited purpose of removing this action from the Circuit Court for Davidson County, Tennessee. Defendant reserves the right to raise all defenses and objections in this action after its removal to this Court.

2. On or about August 17, 2011, Plaintiff Karla Molina-Parrales (“Plaintiff”) filed a Complaint in the above-captioned action styled *Karla Molina-Parrales v. Shared Hospital Services Corporation* in the Circuit Court for Davidson County, Tennessee, Case No. 11C3230. Plaintiff’s Complaint included claims against Defendant under Tennessee state law, but it did not include any federal claims.

3. On August 14, 2012, Plaintiff filed a Motion to Amend her Complaint in the Circuit Court for Davidson County, seeking to add federal claims under Title VII of the Civil

Rights Act of 1964 and the Americans with Disabilities Act Amendments Act. Plaintiff sought to add these claims following her receipt of a Dismissal and Notice of Right to Sue from the Equal Employment Opportunity Commission.

4. On August 31, 2012, the Circuit Court for Davidson County entered an Order granting Plaintiff leave to file her Amended Complaint. On September 4, 2012, Plaintiff filed her Amended Complaint in the Circuit Court for Davidson County.

5. Plaintiff's Amended Complaint is one over which this Court has original jurisdiction pursuant to the provisions of 28 U.S.C. § 1331 and is one which is removed to this Court by Defendant pursuant to 28 U.S.C. § 1441(a) by virtue of the fact that it is a civil action founded on a claim or right arising under the Constitution, treaties, or laws of the United States. Specifically, Plaintiff's Amended Complaint asserts causes of action under Title VII of the Civil Rights Act of 1964 and the Americans with Disabilities Act Amendments Act.

6. There is only one defendant, and it consents to removal of this action.

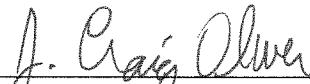
7. Venue is proper in this district under 28 U.S.C. § 1441(a) because the state court where the suit has been pending is located in this district.

8. In accordance with 28 U.S.C. § 1446(a), copies of all pleadings, process, and orders served upon Defendant in the state court suit are attached to this Notice as Exhibit A. As required by 28 U.S.C. § 1446(d), a Notice of Filing of Notice of Removal, with a copy of this Notice of Removal attached, will promptly be filed in the Circuit Court for Davidson County, Tennessee.

WHEREFORE, Defendant hereby removes the action pending against it in the Circuit Court for Davidson County to the United States District Court for the Middle District of Tennessee.

Respectfully submitted,

BRADLEY ARANT BOULT CUMMINGS LLP

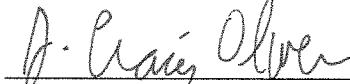
By: 

J. Craig Oliver (BPR No. 016838)
John P. Rodgers (BPR No. 30324)
1600 Division Street, Suite 700
P.O. Box 340025
Nashville, Tennessee 37203
(615) 244-2582

Attorneys for Defendant Shared Hospital Services Corporation

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing is being forwarded via First Class U.S. Mail, postage prepaid, to Nina H. Parsley, 1000 Jackson Road, Suite 225, Goodlettsville, Tennessee 37072, on this the 13th day of September, 2012.


J. Craig Oliver